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Progressive Direct Insurance Co.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANTAWN PRICE, an individual,
Plaintiff,

vs.

JASMIN VARGAS; PROGRESSIVE DIRECT
INSURANCE COMPANY; and DOES I through
X, inclusive; and ROE CORPORATIONS I through
X, inclusive,

Defendants.

Case No: 2:24-cv-01873-JAD-MDC

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR FILING
RESPONSE TO PLAINTIFF'S MOTION
TO REMAND (First Request)**

ECF No. 8

Defendant PROGRESSIVE DIRECT INSURANCE COMPANY (Progressive) and Plaintiff ANTAWN PRICE, through their respective counsel, submit the following stipulation and order to extend the deadline for Defendant to file its Opposition to Plaintiff's Motion to Remand (ECF No. 5). This is the first stipulation for extension of time to file a response to Plaintiff's Motion to Remand.

Plaintiff filed his Motion to Remand on October 22, 2024. Currently, responses are due by November 5, 2024. The parties have agreed to a 1 week extension for Defendant Progressive to file its Response to said motion. The extension is requested due to lead counsel for Defendant having been involved in trial preparation in another matter. Additionally, the associate attorney assigned to this matter has also been out of the office for a scheduled family vacation. As such, the parties hereby request that **the deadline for Defendant Progressive to file its response to Plaintiff's Motion to Remand be continued to November 12, 2024.** The hearing on said motion is currently scheduled for December 4, 2024.

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1 This Stipulation is submitted in good faith and is not interposed for purposes of delay. **This is**
2 **the first request to extend the deadline for filing a response to Plaintiff's Motion to Remand.**

3 DATED this 5th day of November, 2024

DATED this 5th day of November, 2024

4 BARRON & PRUITT, LLP


LAW OFFICES OF JAMES J. REAM

5
6 /s/ William H. Pruitt
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/s/ James J. Ream
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11 ORDER

12 IT IS SO ORDERED. Defendant's deadline to respond to the motion to remand [ECF No. 5]
13 is extended to November 12, 2024.

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15 U.S. District Judge Jennifer A. Dorsey
16 Dated: November 6, 2024
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